



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 2024 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARTIN LOPEZ TORRES,
aka "Rafael Lopez,"

Defendant.

5:24-CR-00268-JGB

I N D I C T M E N T

[18 U.S.C. § 1542: False Statement
in a Passport Application;
18 U.S.C. § 1028A(a)(1):
Aggravated Identity Theft;
18 U.S.C. §§ 981(a)(1)(C), 982,
and 28 U.S.C. § 2461(c): Criminal
Forfeiture]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 1542]

On or about December 23, 2019, in Riverside County, within the Central District of California, defendant MARTIN LOPEZ TORRES, also known as "Rafael Lopez," willfully and knowingly made false statements in an application for a United States passport, with intent to induce and secure for his own use the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of such passports and the rules prescribed pursuant to such laws, in that, in such application,

1 defendant LOPEZ TORRES stated that his name was P.I.V.M, his date of
2 birth was in 1959, his place of birth was in Puerto Rico, and his
3 Social Security Number was XXX-XX-1524, whereas, in fact, as
4 defendant LOPEZ TORRES then knew, his name was not P.I.V.M., his date
5 of birth was not in 1959, his place of birth was not in Puerto Rico,
6 and his Social Security Number was not XXX-XX-1524.

COUNT TWO

[18 U.S.C. § 1028A(a)(1)]

On or about December 23, 2019, in Los Angeles County, within the Central District of California, defendant MARTIN LOPEZ TORRES, also known as "Rafael Lopez," knowingly possessed and used, without lawful authority, means of identification that defendant LOPEZ TORRES knew belonged to another person, namely, the name, date of birth, and Social Security Number of P.I.V.M., during and in relation to the offense of False Statement in a Passport Application, a felony violation of Title 18, United States Code, Section 1542, as charged in Count One of this Indictment.

FORFEITURE ALLEGATION ONE

[18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), in the event of the Defendant's conviction of the offense set forth in any of Counts One or Two of this Indictment.

2. The Defendant, if so convicted, shall forfeit to the United States of America the following:

(a) All right, title, and interest in any and all property, real or personal, constituting, or derived from, any proceeds traceable to the offense; and

(b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), the Defendant, if so convicted, shall forfeit substitute property, up to the value of the property described in the preceding paragraph if, as the result of any act or omission of the Defendant, the property described in the preceding paragraph or any portion thereof (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been

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1 substantially diminished in value; or (e) has been commingled with
2 other property that cannot be divided without difficulty.

3
4
5 A TRUE BILL

6
7 /s/_____
8 Foreperson

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10 E. MARTIN ESTRADA
United States Attorney

11 MACK E. JENKINS
12 Assistant United States Attorney
Chief, Criminal Division

13 

14
15 SCOTT M. GARRINGER
Assistant United States Attorney
16 Deputy Chief, Criminal Division

17 FRANCES S. LEWIS
Assistant United States Attorney
18 Chief, General Crimes Section

19 BENEDETTO L. BALDING
Assistant United States Attorney
20 Deputy Chief, General Crimes Section

21 DANBEE C. KIM
Assistant United States Attorney
22 General Crimes Section